T· ·Mobile·

March 24, 2003

Ms. Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street **SW**
Washington, DC 20554

RE: Richardson Certification Filing for the
Nassau County Police Department in New York
WT Docket No. 01-76

Dear Ms. Dortch:

Pursuant to the City of Richardson Reconsideration Order,[1] enclosed is T-Mobile **USA**. Inc.'s certification with respect to the E911 request it has received from the Nassau **County** Police Department in New York.

Please contact me at 202-651-5900 with any questions or concerns.

Sincerely

Robert A. Calaff
Senior Corporate Counsel
Governmental and Industry Affairs

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[1] Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order on Reconsideration*, rel. Nov. 26, 2002 (City of Richardson Reconsideration Order).

CERTIFICATION OF TIM WONG

I, Tim Wong, certify:

1   This certification is made on behalf of T-Mobile USA, Inc. ("T-Mobile") under Section 20.18(j)(4) of the Commission's rules, 47 C.F.R. § 20.18(j)(4).

2   I ani Chief Technology Officer of T-Mobile. As Chief Technology Officer, I am responsible for and have general knowledge of T-Mobile's deployment of E-911 service. To the extent this certification discusses E911 deployment on the Public Safety Answer Point's ("PSAP") side of the deniarcation point, those portions of this certification are based on T-Mobile's best understanding of those facts and circumstances, which is based largely on the representations of the PSAP and/or its Local Exchange Carrier ("LEC").

3   Nassau County Police Department, a New York PSAP, requested Phase 1 E911 service on October 10, 1998. More than six months have elapsed since the date of receipt of this request and the deployment has not been completed.

3   To the best of my knowledge, the PSAP known as Nassau County Police Department is currently not able to receive and utilize Phase I E911 data elements. I describe below the basis for this detemiination and reasons why further implementation efforts cannot be made until the PSAP becomes capable of receiving and utilixing the data elements associated with the E911 service requested.

> (a.)   (i)   According to its records, T-Mobile provided Nassau County Police Department with map and data tiles on June 6, 2002 and requested on June 6, 2002 that the PSAP provide T-Mobile with routing instructions for the PSAP's E911 calls. The PSAP has not provided T-Mobile with the requested routing instructions.
>
> (ii)   Without routing instructions, T-Mobile cannot: complete and send the data file to the ALI database provider, perform Mobile Switching Center and Gateway Mobile Location Center data translations, or test the requested service. Until the PSAP provides routing instructions to T-Mobile so that T-Mobile can complete these steps, T-Mobile will not be able to transmit E911 data elements to the proper nodes within the area covered by Nassau County Police Deparlment's request, and Nassau County Police Department will therefore not be able properly to receive and utilize E911 data elements.

5.   Listed in Attachment "A," attached hereto, are the specific steps T-Mobile has taken to provide the requested service to Nassau County Police Department, and the specific steps that remain to be completed by T-Mobile. "Yes" means T-Mobile has completed that step. "Incapable" means T-Mohilc cannot complete that step until the PSAP or LEC complcles certain prerequisite steps, as described above. "N/A" means that the specific step is not applicable to the requested service in this instance (*i.e.*, it is a Phase I request and the specific step listed is Phase II only).

6. Listed in Attachment "B," attached hereto, are the specific steps that remain to be completed by the PSAP or other parties before T-Mobile can provide the E911 service requested. "Yes" means that, to the best of T-Mobile's understanding, the PSAP has completed that step. "No" means that, to the best of T-Mobile's understanding, the PSAP or other responsible party, has not completed that step. "N/A" means that the step is not applicable to the requested service in this instance. "Unknown" means that T-Mobile does not have sufficient knowledge to make any determination regarding the status of that step.

7. In accordance with Section 20.18(j)(4)(i) of the Commission's rules, on March 3, 2003, T-Mobile provided, by overnight, express delivery, written notice to the Nassau County Police Department of T-Mobile's intent to file this certification.. Nassau County Police Department did not respond to that notice.

I certify under penalty of perjury that the foregoing is true and correct

Executed on March __2(__, 2003, by:

_____
Chief Technology Officer
Chief Technology Officer

ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mobile toward E911 Implementation for Nassau County Police Department

☒Yes ☐Incapable ☐N/A — Built, tested, and integrated the Gateway Mobile Location Center ("GMLC") into T-Mobile's network

☐Yes ☐Incapable ☒N/A — Built, tested, and integrated the Serving Mobile Location Center ("SMLC") into T-Mobile's network (Phase II only)

☐Yes ☐Incapable ☒N/A — Built, tested, and integrated Location Measurement Unit(s) ("LMU") (Phase II, EOTD only)

☒Yes ☐Incapable ☐N/A — Upgraded, tested, and patched sofiware in Mobile Switching Center(s) ("MSC")

☒Yes ☐Incapable ☐N/A — Upgraded, tested, and patched software in Base Station Controller(s)

☒Yes ☐Incapable ☐N/A — Kequested selective router location (CLLI codes) from the PSAP or obtained location from an alternate source

☒Yes ☐Incapable ☐N/A — Sent coverage map(s) to the PSAP

☒Yes ☐Incapable ☐N/A — Sent data file(s) to the PSAP

☒Yes ☐Incapable ☐N/A — Requested routing instructions from the PSAP

☒Yes ☐Incapable ☐N/A — Prepared network design diagram

☒Yes ☐Incapable ☐N/A — Performed trunk sizing (*i.e.*, determined the number of trunks required)

☒Yes ☐Incapable ☐N/A — Completed forms and exhibits for ordering trunks from LEC

☒Yes ☐Incapable ☐N/A — Obtained PSAP authorization to order trunks, if applicable

☒Yes ☐Incapable ☐N/A — Ordered trunk(s) from LEC

ATTACHMENT A
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☒ Ycs ☐ Incapable ☐ N/A   Ordered iransport from LEC, if applicable

☒ Ycs ☐ Incapable ☐ N/A   Tested trunks

☒ Yes ☐ Incapable ☐ N/A   Requested pANI assignment from LEC or obtained from an alternate source

☒ Yes ☐ Incapable ☐ N/A   Completed data file for delivery to PSAP

☒ Yes ☐ Incapable ☐ N/A   Sent data file to PSAP

☒ Yes ☐ Incapable ☐ N/A   Completed date file for delivery to ALI database provider

☒ Yes ☐ Incapable ☐ N/A   Sent data tile to ALI database provider

☐ Yes ☒ Incapable ☐ N/A   Performed MSC data translation (script allowing routing of E911 voice to correct PSAP and identification of the receiving tower)

☐ Yes ☒ Incapable ☐ N/A   Perfomied GMLC data translation (script allowing routing of E911 data to correct PSAP and identification of the receiving tower)

☐ Ycs ☒ Incapable ☐ N/A   Scheduled testing with PSAP

☐ Yes ☒ Incapable ☐ N/A   Perforincd profile test

☐ Yes ☒ Incapable ☐ N/A   Performed field test

☐ Ycs ☒ Incapable ☐ N/A   Reconciled field test

☐ Ycs ☒ Incapable ☐ N/A   Pci-formed retest, if applicable

☐ Ycs ☒ Incapable ☐ N/A   Accepted testing (provisioning complete)

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ATTACHMENT B to Certification of Tim Wong
Actions Required By Nassau County Police Department Or Other Parties Before T-Mobile
Can Complete E91 I Implementation

☐ Yes ☐ No ☒ Unknown ☐ N/A   Requested service froni LEC (PSAP)

☒ Yes ☐ No ☐ Unknown ☐ N/A   Sent selective router location (CLLI codes) to T-Mobile (PSAP)

☐ Yes ☒ No ☐ Unknown ☐ N/A   Sent routing instructions to T-Mobile (PSAP)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Upgraded Customer Premises Equipment ("CPE") (including Computer Aided Dispatch ("CAD"), Geographic Information System ("GIS"), and 10-digit capability) (PSAP)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Built Master Street Address Guide ("MSAG") (PSAP)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Completed data file upload (LEC)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Upgraded ALI database, if applicable (LEC)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Upgraded selective router, if applicable (LEC)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Provisioned trunks for T-Mobile (LEC)

☐ Yes ☐ No ☒ Unknown ☐ N/A   Provisioned or upgraded trunks for PSAP (from Phase zero to Phase I or ll), if applicable (LEC)

ATTACHMENT B
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